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William T. Sessions, Chief
Standardization Branch
Livestock and Seed Program
AMS, USDA, Room 2603-S, STOP 0254,
1400 Independence Ave, SW
Washington, DC 20250-0254

Dear Chief Sessions,

I am writing to urge you to withdraw and reconsider USDA Agricultural Marketing Services' proposed livestock and meat marketing claims (Docket No. LS-02-02). If adopted, many of the proposed claims and standards will create giant loopholes for industrial style meat producers, mislead consumers, and potentially destroy the livelihoods of farmers raising animals without antibiotics.

Four proposed claims and standards merit special attention. The claim "no antibiotic residues" misses the point – it is not the residue that consumers are concerned about – feedlot owners are required to keep animals from receiving antibiotics prior to slaughter – so this claim should be abandoned.

The proposed claims "not fed antibiotics" and "raised without antibiotics" are confusing to consumers. "Not fed antibiotics" can be claimed on any meat products from animals raised without "subtherapeutic" antibiotics. Meat producers use antibiotics for reasons other than therapy – and so they would not be affected by the legislation. The "not fed antibiotics" claim should be withdrawn.

Finally, USDA has proposed that meat can be labeled "grass fed," even if animals receive as much as 20% of their nutrition from sources other than grazing. This is an issue because cattle sent to industrial style feedlots prior to slaughter, receive a diet consisting primarily of corn and other grains, which fattens cattle faster, but can cause diseases – for which feedlot owners feed with antibiotics – to treat illnesses created by their choice of feed and management techniques. Cattle that are truly grass fed throughout their lives require few antibiotics. Consumers would no longer be able to discriminate between truly grass fed cattle and those which receive antibiotics, and farmers will not be able to be rewarded for taking the time and effort to raise antibiotic-free cattle.

Thus, current proposed labeling claims appear to benefit industrial style animal producers. If these claims are adopted, the losers will be consumers and the farmers and ranchers who now make their living by providing meat from animals raised by alternative methods.

I urge you to withdraw and rethink the claims and standards mentioned above, after consulting with a broad range of stakeholders, including producers and consumers of alternative meat products.

Sincerely,



Alexandra Radbil
